



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10
IDAHO OPERATIONS OFFICE
950 West Bannock, Suite 900
Boise, Idaho 83702**

April 14, 2016

Molly R. Prickett
Environmental Engineer
Monsanto Company
Soda Springs Operations
1853 Highway 34
Soda Springs, Idaho 83276

Re: Conditional Approval of Ballard Mine Feasibility Study Report, Memorandum 1, Site Background and Screening of Technologies, Draft Final Revision 1, March 2016

Dear Ms. Prickett,

The Agencies and Tribes (A/T) have reviewed the above referenced deliverable, submitted pursuant to the Administrative Settlement Agreement and Order on Consent/Consent Order for Performance of Remedial Investigation and Feasibility Study at the Enoch, Henry, and Ballard Mine Sites in Southeastern Idaho (or 2009 AOC). We have reviewed this document to ensure that the revised document responds to and incorporates changes agreed to during the response to comment process. In conducting our final review, we have identified the following issues to be addressed in the final.

- Section 1.3.1, page 1-4 of RL-SO version. The narrative states that the contamination of the Ballard Shop Area will be addressed in the future when the facility is no longer in use, and is therefore not addressed in the FS. Delete the phrase "... and it is not addressed in this FS." We agree that remediation of the shop area may be deferred while that area is being used in the future. Discussion of the shop area should, however, be carried into FS tech memo #2. The FS TM#2 should briefly describe actions necessary, including ICs, to maintain protectiveness for the existing industrial use. TM #2 should also describe approaches for final remediation, including ICs, for this area to meet PRAOs. This will ensure that future cleanup work at this small portion of the Ballard site is tracked along with the other elements of the project.
- Section 2.1, 2nd paragraph, 3rd sentence: Revise sentence to read "and is enriched with COCs/ROCs/COECs which includes metals, metalloids, naturally occurring uranium, and uranium-daughter products (e.g., radium-226 and radon-222).
- Section 3.5, page 3-5 of RL-SO version. According to Table 3-7, background antimony concentration for upland soil is 3.6 mg/kg not 0.745 mg/kg as stated here.

- Section 4.3.2, page 4-13 of RL-SO version, paragraph 1 (partial), line 9. Change “created” to “create.”

As these are minor issues, I am providing conditional approval the deliverable. Please proceed with issuing a final version and distribute to the agencies and tribes. Please contact me if you have questions. I can be reached at 208-378-5763 or electronically at tomten.dave@epa.gov.

Sincerely,

//s//

Dave Tomten
Remedial Project Manager

cc: Mike Rowe, IDEQ - Pocatello
Jeremy Moore, US FWS – Chubbuck
Kelly Wright, Shoshone Bannock Tribes
Shannon Ansley, Shoshone Bannock Tribes (electronic version only)
Sandi Fisher, US FWS – Chubbuck (electronic version only)
Sherri Stumbo, Forest Service – Pocatello (electronic version only)
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Dennis Smith, CH2MHill (electronic version only)
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